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May 3, 2002

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Contact:
Second Joint Application of BellSouth For Authorization Under Section 271 Of The
Communications Act To Provide In-Region, InterLATA Service In The States Of Georgia
and Louisiana, CC Docket No. 02-35

Dear Ms. Dortch:

On Thursday May 2, 2002, Richard Rocchini, David Eppsteiner and I met with Kyle Dixon, Chairman Powell's Legal Adviser, regarding the above referenced proceeding. In that meeting, we reiterated AT&T's opposition to BellSouth's application for all of the reasons articulated by AT&T in its Comments, Reply Comments and ex parte filings in this docket. In particular, we focused on the OSS flow through, OSS data integrity and OSS change management issues. During the meeting, we provided a copy of AT&T's April 19, 2002 *ex parte* submission and the attached document demonstrating the fact that BellSouth's flow through rates have not improved during the past twelve months.

The positions expressed by AT&T during the meeting were consistent with those contained in the Comments and ex parte filings previously made in each of these dockets. One electronic copy of this Notice is being submitted in accordance with the Commission's rules.

Sincerely,

A handwritten signature in cursive script that reads "Robert W. Quinn, Jr.".

Enclosures
cc: Kyle Dixon

Manual Processing of Electronically Submitted LSRs and Flow-Through Have Not Improved

Manual Processing of Electronic LSRs

- In March 2002, BellSouth sent 87, 436 correct and valid electronically submitted LSRs to the LCSC for manual processing.
- This is 21% of the total of electronically submitted LSRs and continues the historical trend that 1 out of 5 valid LSRs is sent to the LCSC because of BellSouth's system design and processing failures.
- Each LSR needlessly sent to the LCSC encounters delay and is subject to a lower rate of service order accuracy.

LSR Type	Total Electronic LSRs	BellSouth Designed Manual Fallout	BellSouth System Error
	Number	Number / %	Number / %
Non-LNP	397,573	36,578 / 9.2%	43,015 / 10.8%
LNP	18,705	7,120 / 38.1%	723 / 3.9%
Total	416,278	43,698 / 10.5%	43,738 / 10.5%

Flow Through - Data

- Flow through performance has not improved in 2001 or to date in 2002.
- Both Non- LNP FT and Achieved results for 2002 are below results for the same months in 2001 for two out of three months.
- The trend for both Non-LNP results in 2002 is downward.
- BellSouth's reported LNP results for January and February 2001 were invalid.
- For March, the 2002 LNP FT result appears to be 6% better than the 2001 result, but comparison of the FCC-compliant, more accurate Achieved result reveals that performance actually declined by 5%.

Month	2001		2002	
	Non-LNP FT / Achieved	LNP FT / Achieved	Non-LNP FT / Achieved	LNP FT / Achieved
January	89% / 80%	Invalid	87% / 78%	93% / 51%
February	86% / 77%	Invalid	86 % / 77%	94% / 53%
March	88% / 77%	86% / 57%	85% / 76 %	92% / 52%

FT = BellSouth's reported result which improperly excludes it decisions not to program electronically submitted LSRs for flow-through from the measurement.

Achieved = result measured in compliance with FCC guidance which excludes only CLEC caused errors from the measurement.

Flow Through – Benchmark

- In 2002 BellSouth continues to miss flow through performance benchmarks.
- 8 of 12 benchmarks have been missed.

Month	Resale Residence	Resale Business	UNE Non-LNP	UNE LNP
	Benchmark 95%	Benchmark 90%	Benchmark 85%	Benchmark 85%
January	No	No	Yes	Yes
February	No	No	No	Yes
March	No	No	No	Yes